WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION Community Nutrition Programs Child and Adult Care Food Program

Guidance Memorandum E: For Sponsoring Organizations of the Child and Adult Care Food Program (CACFP) in Day Care Homes

Topic: Requirements for Training

Date: November 2004

The USDA Child Care Food Program regulations state:

226.16(d) "Each sponsoring organization must provide adequate supervisory and operational personnel for the effective management and monitoring of the Program at all facilities it sponsors. Each sponsoring organization must employ monitoring staff sufficient to meet the requirements of paragraph (b)(1) of 226.16(d). At a minimum, Program assistance must include:

- Training on Program duties and responsibilities to key staff from all sponsored facilities prior to beginning of Program operations. At a minimum, such training must include instruction, appropriate to the level of staff experience and duties, on the Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, and reimbursement system. Attendance by key staff, as defined by the State agency, is mandatory. [226.16(d)(2)]
- 2. Additional mandatory training sessions for key staff from all sponsored child care and adult day care facilities not less frequently than annually. At a minimum such training must include instruction, appropriate to the level of staff experience and duties, on the Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, and reimbursement system. Attendance by key staff, as defined by the State agency, is mandatory." [226.16(d)(3)]

Pre-Approval Training

Home providers must receive training in CACFP requirements and provider responsibilities prior to the submission of their application to the Department of Public Instruction. This training may be provided at the time of the pre-approval visit or in a separate meeting.

Additional Required Training

Additional training must be provided at least once every year. Sponsors may fulfill the training requirement for their providers in a variety of ways (e.g., group training, training in the provider's home, online training or as an independent study unit). Topics for training, appropriate to the provider's level of experience, must include at a minimum instruction on:

- 1. Serving meals which meet the CACFP meal patterns;
- 2. Taking accurate meal counts (meal counts must be recorded by the end of each serving day);
- 3. Submitting accurate meal claims;
- 4. How the sponsor will review the provider's monthly claims;
- 5. The Program's reimbursement system; and
- 6. Compliance with the Program's recordkeeping requirements.

The DPI recommends that the sponsor monitors receive training in the same content areas as the providers.

If a sponsoring organization combines this training with other topics, only that portion of costs directly related to the CACFP may be claimed as an allowable Program expense. Training sessions presented by other organizations will meet the CACFP training requirement if the material is relevant to the CACFP and it meets the requirements as specified under items 1-6 above, and the training has been approved by the sponsoring organization. The training requirement is specific to the provider, that being the individual who has signed the Program Agreement (PI-1425). It can not be fulfilled by any other individual.

The Department of Public Instruction recommends that sponsors carefully monitor throughout the year the achievement of the annual training requirement by all providers. A provider who has not received training by early summer should be reminded of this Program requirement, and the consequences should the provider fail to meet the training requirement before the end of the current fiscal year (September 30).

It is the expectation of the Department of Public Instruction that all providers will fulfill the requisite training requirement each year, prior to the end of the federal fiscal year. In certain limited circumstances, providers may be allowed to obtain training at the beginning of a new federal fiscal year, with the intent of applying this training towards the training requirement for the prior federal fiscal year, under the following circumstances:

- 1. The provider must be notified in writing that they have failed to meet the annual training requirement for the prior federal fiscal year, and that they have 60 calendar days (as of the date of the sponsor's letter) to obtain (and document) the required training;
- 2. If, at the end of the 60 day period, the provider has failed to obtain and document the required training they must be declared seriously deficient, with the corrective action plan stating that:
 - a. The required training be obtained within 30 calendar days from the date of the serious deficiency declaration, and
 - b. Failure to comply with the annual training requirement in the future with result in a Notice of Intent to Terminate.

In the above situation the provider must obtain two trainings in a given federal fiscal year. The first training would meet the training requirement for the prior federal fiscal year, and the second training would apply to the current federal fiscal year.